



SAN DIEGO • SAN FRANCISCO  
NEW YORK • BOCA RATON  
WASHINGTON, DC • HOUSTON  
LOS ANGELES • PHILADELPHIA

Mario Alba, Jr.  
MAlba@csgrr.com

February 27, 2008

**MEMO ENDORSED**

VIA FACSIMILE

Honorable Laura T. Swain  
United States District Judge  
United States Courthouse  
500 Pearl Street,  
New York, NY 10007

Re: *Eastriver Partners, Inc. vs. Focus Media Holding Limited, et al., Civil Action*  
*No. 07-cv-10617 and all related cases* 07 CIV 11479 (LTS)  
(LTS)

Dear Judge Swain:

We represent plaintiff Eastriver Partners, Inc. and proposed Lead Plaintiff movant Iron Workers Local No. 25 Pension Fund ("Iron Workers"). By Order dated December 21, 2007, this Court entered an Order setting an initial conference for March 7, 2008. By Order dated February 5, 2008, this Court also entered an Order setting a briefing schedule and hearing date of March 4, 2008 for any opposition to the motion filed by Iron Workers seeking consolidation of the related actions, appointment of Iron Workers as Lead Plaintiff and approval of our firm as Lead Counsel for the proposed class ("Iron Workers' Motion").

The deadline for filing any opposition to Iron Workers' Motion has now passed and no one has filed any opposition; Iron Workers' Motion is therefore unopposed. Earlier today, the Court entered an Order approving the parties' Stipulation and Order Extending Time to Respond to Complaints, which set forth a schedule for the filing of an amended complaint and the briefing on defendants' anticipated motion to dismiss.

Accordingly, we respectfully request that the Court grant Iron Workers' unopposed motion and, in an effort to conserve judicial time and resources, adjourn the hearings set for March 4, 2008 and March 7, 2008 until after the motion to dismiss has been fully briefed. Of course, if the Court prefers for counsel to appear at either of those hearings, we are fully prepared to.



Honorable Laura T. Swain  
February 27, 2008  
Page 2

We have conferred with counsel for Defendants who join in the requests for adjournment (but take no position on the appointment of lead plaintiff or lead counsel).

Very truly yours,

*Mario Alba, Jr.*  
Mario Alba, Jr.

MA:dc

cc: attached service list (via email)

*The pending motion is taken on submission and  
The March 4, 2008 and March 7, 2008 hearing and  
conference dates are marked off the calendar.*

SO ORDERED.

*Laura Taylor Swain* 2/29/08  
\_\_\_\_\_  
LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE